



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

October 3, 1994

Mr. Fred Evans
Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

**Re: Building 95 Removal Action Site
Reevaluation of Ecological Pyrethrin Cleanup Concentrations**

Dear Fred:

This letter is in response to your letter dated September 8, 1994. The U.S. Environmental Protection Agency (EPA) with the technical assistance of U.S. Fish and Wildlife Service (USFWS) has reviewed this proposal. For your information, the USFWS comment letter is provided as an attachment to this letter.

As suggested by me at our Technical Review Committee meeting on May 19th, I thought that removal action activities, including the additional excavations planned for north of Avenue B, have mitigated a majority of the risk due to pesticides particularly DDT and reevaluating the remediation goal for pyrethrins would provide a creative solution that all parties could accept, and be protective of human health and the environment. But due to disagreement with the newly proposed receptor, the EPA can not concur with the Navy's revised PRG of 250ppm for pyrethrins. As stated in the USFWS letter, the use of a deer mouse as a new receptor is not acceptable because insects for which pyrethrins target do not constitute a majority of the mouse's diet.

Although the EPA does not concur with the revised PRG, the EPA supports the Navy's proposed action of backfilling the excavated area South of Avenue B with two feet of clean fill. Should you have any questions, please feel free to call me at (617) 223-5521.

Sincerely,

Robert Lim, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc. Steve Mierzykowski/USFWS
Nancy Beardsley/MEDEP



Jim Caruthers/NASB

Elizabeth Walter/ABB-ES, Inc.

Susan Weddle/BACSE

Carolyn LePage/Gerber, Inc.

Sam Butcher/Harpswell Community Rep.

Rene Bernier/Topsham Community Rep.